

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Manuel Rebollo De La Luz, Plaintiff  
v.  
Ignacio Noemi Food, Inc., Nachito Food, Inc.,  
and Ignacio Carvajal, individually, Defendants.

Case No. 1:17-cv-04756  
Judge: Hon. Joan B. Gottschall

**MOTION FOR COURT APPROVAL OF SETTLEMENT  
AND DISMISSAL OF PLAINTIFF'S CLAIMS**

NOW COMES the Plaintiff through counsel, and moves the Court to approve the settlement entered between Defendants and Plaintiff and submitted to the Court for *in camera* inspection. In support of the motion, the Plaintiff states:

1. On June 26, 2017, Plaintiff filed a Complaint in the United States District Court for the Northern District of Illinois, Eastern Division (the "Court") against Defendants alleging violations of the Fair Labor Standards Act ("FLSA") and the Illinois Minimum Wage Law ("IMWL").
2. Following negotiations, the parties have reached a mutually satisfactory settlement.
3. When an employee asserts a claim against his employer or former employer for wages under the FLSA or IMWL, any settlement of that claim requires a court to review the settlement for fairness. *Walton v. United Consumers Club, Inc.*, 786 F.2d 303, 306 (7th Cir. 1986) (FLSA); *Lewis v. Giordano's Enters., Inc.*, 921 N.E.2d 740, 751 (1st Dist. 2009) (IMWL).
4. The Settlement Agreement (the "Agreement") between the parties will be submitted to the Court for approval pursuant to the Court's order of November 29, 2017. [Dkt. 15]
5. The Parties request the Court approve the Agreement because it is a fair and reasonable resolution of bona fide disputes over wages under the FLSA and IMWL between them.

6. Upon approval of the Agreement, the Parties further request the dismissal of Plaintiff's claims with prejudice, and with each party to bear its own attorneys' fees and costs except as otherwise agreed.

WHEREFORE, for the foregoing reasons, Plaintiff and Defendants respectfully request that this Court enter an Order approving the Agreement as a fair and reasonable resolution of bona fide disputes under the FLSA and IMWL between Plaintiff and Defendants, and dismiss with prejudice, and with each party to bear its own attorneys' fees and costs except as otherwise agreed.

Respectfully submitted on Tuesday, December 12, 2017.

**s/ Valentin T. Narvaez**

Plaintiff's counsel

Consumer Law Group, LLC

6232 N. Pulaski, Suite 200

Chicago, IL 60646

Direct: 312-878-1302

vnarvaez@yourclg.com